

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
Northern DIVISION

2007 JUL 18 A 10:28

PRASHANTH C. SAI RANGA

Plaintiff(s),

v.

VICTOR BIEBIGHAUSER
SOUTH UNIVERSITY OF ALABAMA

Defendant(s).

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CIVIL ACTION NO.

2:07 CV 655 -WKW


COMPLAINT

1. Plaintiff(s)' address and telephone number: P O BOX 2407, OPELIKA, AL-36801
2. Name and address of defendant(s): VICTOR BIEBIGHAUSER, PRESIDENT.
SOUTH UNIVERSITY
5600, VAUGHN ROAD
MONTGOMERY, ALABAMA-36116
3. Place of alleged violation of civil rights: SOUTH UNIVERSITY, MONTGOMERY, AL
4. Date of alleged violation of civil rights: JANUARY 2007
5. State the facts on which you base your allegation that your constitutional rights have been violated: WHEN I STARTED MY JOB AS AN INSTRUCTOR WITH THE DEPT OF INFORMATION TECHNOLOGY, I WAS WAY MORE QUALIFIED THAN THE INCUMBANT PROGRAM DIRECTOR. HOWEVER, THE MANAGEMENT OF SOUTH UNIV. TOLD ME THAT I WOULD BE MADE THE PROGRAM DIRECTOR UPON COMPLETION OF MY PhD (WHICH I WAS PURSUING AT THE TIME OF MY APPOINTMENT IN OCT/04). HOWEVER AFTER THE COMPLETION OF MY PhD FROM AUBURN UNIV IN DEC/06, THE MANAGEMENT BRUSHED ASIDE THE ISSUE AND REFUSED TO PROMOTE ME. THIS DESPITE THE FACT THAT I WAS WAY MORE QUALIFIED (WITH A PhD) THAN THE INCUMBANT PROGRAM DIRECTOR (MR. RON MOODY) AND HAD MORE TEACHING EXPERIENCE.

TOGETHER WITH THIS, MR MOODY CONSISTENTLY HARASSED ME BY UNDERMINING MY PERFORMANCE AND BY MAKING FRIVOLOUS COMPLAINTS AGAINST ME TO THE DEAN OF ACADEMIC AFFAIRS (MR. BASIL MARLY) THROUGH EMAIL. ONE SUCH COMPLAINT WAS REGARDING THE FACT THAT I HAD FORGOTTEN TO LOG OFF FROM THE INSTRUCTOR'S COMPUTER IN THE CLASSROOM.

6. Relief requested: 3 MILLION USD

Date: 07/04/2007



Plaintiff(s) Signature

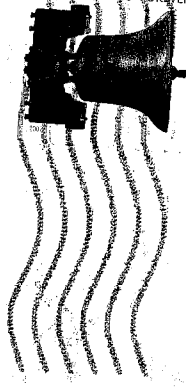
PRASHANT SAIRANGA, PhD

P.O BOX 2407

OPELIKA, AL - 36801

MONTGOMERY AL 361

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MIDDLE DISTRICT OF ALABAMA

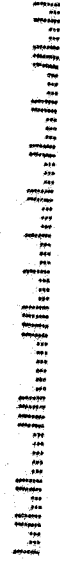
OFFICE OF

CLERK, UNITED STATES DISTRICT COURT

PO BOX 711

MONTGOMERY, AL 36101-0711

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